



(10)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 5 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Wood Preservative Working Group Meeting - Consumer Awareness Program

FROM: Spencer L. Duffy, Review Manager *SLD*
Special Review Branch

TO: Addressees

The wood preservative working group will meet with representatives from the Wood Treaters Industry on Friday, December 15, 1989 at 2:00 p.m. in Room 1023, Crystal Mall #2.

The purpose of this meeting is to discuss the 1989 Audit of the Consumer Awareness Program (CAP) and to hear the wood treaters suggestions for alternative ways of disseminating useful consumer information regarding the safe use of treated wood. (See attached AWPI letter)

The Special Review Branch believes that it is necessary for the EPA representative to have a short meeting prior to our meeting with the representatives from the Wood Treaters Industry. Accordingly, I am asking the working group to meet on the above date, at the same location (12/15/89, 1023 CM#2) at 12:45 p.m. to discuss the CAP and consolidate our opinion on consumer use of treated wood.

This is a very important meeting. Your presence is needed. If you cannot attend, please send a representative from your organization.

If you have questions or need more information, please contact me on 557-1529.

Addressees:

Cara Jablon
David Stangel ✓
David Albright
James Yowell
Francine Tenecyk
Sidney Jackson

cc: Jack Housenger



Patricia Hamilton
Director of Communications

November 3, 1989

Mr. Spencer Duffy
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Dear Mr. Duffy:

Per our telephone conversation yesterday, the American Wood Preservers Institute and the Society of American Wood Preservers, Inc., are interested in setting up a meeting regarding the wood preserving industry Consumer Awareness Program.

Enclosed is a copy of the Consumer Awareness Program Audit Report, prepared by TechLaw, Inc. The auditor found again this year that 100 percent of the treaters and chemical manufacturers, and 70 percent of the lumber wholesaler/retailers were participating in the program.

*N/O
Audit
Reviewed -
Name Collected
AWP 11/21
GID*

In view of the consistent 70 percent audited level of participation by wholesaler/retailers over the past four years, we would like to explore some other program that might generate useful information for EPA and for the wood preserving industry on consumer knowledge.

Specifically, we believe that investing a similar amount of money into "focus group" discussions, user polls and additional association programs aimed at consumers, would be a worthwhile alternative to a program audit in 1990.

Now that a stable baseline has been established, an every-other-year audit with other activities in off-years might help us better meet our mutual objectives.

We will have additional materials including a further analysis of the auditor's data available at the meeting and anticipate that the meeting take no more than an hour.

We would appreciate meeting with Cara Jablon, Dave Stangle and you on one of the following dates in November, if possible. In addition, we would welcome participation from representatives of the Office of Toxic Substances.

X November 17 between 11:00 a.m. and 3:30 p.m.

X November 30 between 11:00 a.m. and 3:30 p.m.

*stuff not
available*

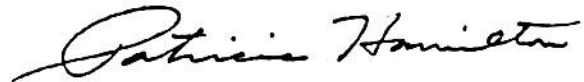
American Wood Preservers Institute

Tyson's International Building
1945 Old Gallows Road, Vienna, VA 22182 (703) 893-4005

I hope one of these dates will be acceptable and appreciate your efforts to coordinate the meeting while the associations are in New Orleans for the Annual Meetings.

Thank you so much.

Yours truly,

A handwritten signature in cursive script that reads "Patricia Hamilton". The signature is fluid and elegant, with a prominent loop at the end of the last name.

Patricia Hamilton

**1989 Audit of the Wood Treating Industry
for Compliance with the Voluntary
Consumer Awareness Program**

Prepared for:

**The American Wood Preservers Institute
and
The Society of American Wood Preservers**

Prepared by:

**TechLaw, Inc.
350 Indiana Street, Suite 410
Golden, Colorado 80401
(303) 278-3040**

Principal Contact: Richard S. Greenberg

September 8, 1989

1989 AUDIT OF THE WOOD TREATING INDUSTRY FOR COMPLIANCE WITH THE VOLUNTARY CONSUMER AWARENESS PROGRAM

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Telephone Survey for Preservative Manufacturer/Formulators (Checklist)
Treated Wood Industry Consumer Awareness Program Audit (Checklist)

APPENDIX B

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Treaters Audited - 1989
Wholesalers/Distributors Audited - 1989
Retailers Audited - 1989

**1989 AUDIT OF THE WOOD TREATING INDUSTRY
FOR COMPLIANCE WITH THE VOLUNTARY
CONSUMER AWARENESS PROGRAM**

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I. EXECUTIVE SUMMARY

On behalf of the American Wood Preservers Institute and the Society of American Wood Preservers, TechLaw, Inc. conducted on-site audits and telephone surveys of the treated wood industry from June through August 1989, to assess the level of compliance by the industry with the voluntary Consumer Awareness Program (CAP). The on-site audits evaluated statistically valid samples of wood treaters and treated wood wholesalers/distributors and retailers. The telephone surveys provided information about wood preservative formulators. The results of the 1989 CAP Audit Program indicate that 100% of the formulators and treaters are aware of the CAP and are participating in the CAP. Seventy-seven percent of the wholesalers/distributors and retailers are aware of the CAP with a 70% participation rate. These results are consistent with those obtained during the 1986-1988 CAP Audit Programs.

II. INTRODUCTION

The American Wood Preservers Institute (AWPI) and the Society of American Wood Preservers (SAWP) retained TechLaw, Inc. (hereinafter "TechLaw") to develop and implement a national plan for auditing compliance with the Consumer Awareness Program (CAP). The CAP was included in a settlement agreement entered into by the Environmental Protection Agency (EPA) and the Wood Treating Industry. The CAP was proposed as a voluntary program to promote public awareness and to educate the public in the use and handling of treated wood products. This audit process is an essential part of a nationwide system to assure that consumers of treated landscape ties, railroad ties, transmission and utility poles, fence posts, lumber, and timber are aware of the proper use of treated wood and the proper precautionary measures to take when using such wood.

In 1986, TechLaw conducted the initial CAP audit. The statistical methodologies employed for that baseline audit program have been followed in all subsequent audit programs. The management personnel have also maintained continuity throughout the 1986-1989 audit programs.

During June through August 1989, TechLaw conducted a telephone survey of 17 formulators and on-site audits of 14 treaters and 58 wholesalers/distributors (W/Ds) and retailers (15 W/Ds and 43 retailers) in order to determine the level of compliance with the voluntary CAP.

This report describes the background of the CAP Audit Program, the approach and protocols used in the program, and the results and conclusions drawn from the telephone surveys and on-site audits. Additionally, two appendices are included which contain example audit checklists and lists of the facilities surveyed or audited. The attachment, bound separately, contains the completed telephone surveys and audit checklists, divided into the following sections: formulators, treaters, wholesalers/distributors, retailers, and follow-up audits.

III. BACKGROUND

On July 13, 1984, the Environmental Protection Agency (EPA) issued a Notice of Intent to Cancel Registration of Pesticide Products Containing Creosote, Pentachlorophenol, and Inorganic Arsenicals. In September of 1985, the EPA and the American Wood Preservers Institute (AWPI), the Society of American Wood Preservers, Inc. (SAWP), *et al.*, entered into a Settlement Agreement pursuant to §6(b) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

As part of the Settlement Agreement, AWPI, SAWP, *et al.*, agreed to implement and participate in a voluntary Consumer Awareness Program (CAP). The agreement stipulated that the CAP be underway within 60 days of the Settlement Agreement date. Within 120 days, the parties to the Agreement were required to consult with EPA on the audit protocol and the selection of a contractor to implement the audit program.

The CAP was designed to achieve EPA's goal of implementing a program to inform all consumers of the proper use and handling of all treated wood products. The key element in the CAP is the Consumer Information Sheet (CIS). A model CIS, developed by AWPI and SAWP in conjunction with EPA, describes use, precautions, and safe working practices with respect to treated wood products. The CIS serves as the main vehicle for conveying information about treated wood to consumers of landscape ties, railroad ties, utility and transmission poles, fence posts, and treated lumber and timber.

Each treater is responsible for assuring that its CIS contains appropriate information from the model CIS based on the type of treatment applied to the wood. The treater is free to add information such as its company name and address and its recommendations for proper use and selection of treated wood. Such information, which may not be inconsistent with the EPA-approved language, may be added as a separate section on the sheet outside the border around the official EPA-approved language.

The CAP identifies and outlines the responsibilities of each of several organizational levels which are linked together in the chain of organizations that supply treated wood to the ultimate consumer. The chain originates with the formulators who provide preservatives to the wood treaters. The wood treaters may sell treated wood to wholesalers/distributors (W/Ds), retailers, and even directly to ultimate consumers. W/Ds may sell treated wood to other W/Ds, to retailers, or directly to consumers. The final link in the chain is represented by the retailers who sell treated wood to the majority of consumers.

The CAP commits AWPI/SAWP to perform and report to EPA the results of annual surveys of participation in the CAP. The AWPI/SAWP is directed to follow-up with corrective action when members and non-members are found not to be in compliance with their responsibilities under the CAP. EPA has also requested that the AWPI/SAWP conduct a follow-up survey of a sample of facilities found not to be participating in the CAP program.

In 1986, TechLaw conducted a baseline survey of industry participation. The 1986 survey indicated that 100% of the formulators were aware of the CAP with 89% participating, 100% of the treaters were aware of the CAP with 97% participating, and 81% of the wholesalers/distributors and retailers (WDRs) were aware of the CAP with 70% participating. In 1987 and 1988, the formulators and treaters consistently had a 100% awareness and participation rate regarding the CAP. In 1987, 79% of the WDRs were aware of the CAP, with 70% participating. In 1988, the WDRs had an awareness rate of 77% and a participation rate of 70%.

IV. APPROACH & PROTOCOLS

TechLaw assessed the awareness of, and participation in, the CAP through telephone surveys and on-site audits of the treated wood industry. Telephone surveys of formulators were used to elicit information regarding awareness of, and participation in, the CAP. Information regarding compliance with the CAP obtained through on-site audits of treaters, W/Ds, and retailers included discussions with the manager or operator of the facility, observations as to whether CISs were being made available, and completion of an audit checklist.

AWPI/SAWP provided TechLaw with the names and addresses of the total population of formulators and treaters from trade association industrial surveys and studies. The names and addresses of the total populations of WDRs were obtained from American Business Directories, Inc.'s *1988 Directory, Lumber Wholesalers* and *1988 Directory, Lumber Retailers*.

TechLaw surveyed the entire population of formulators via the telephone. Because of the larger populations of treaters and WDRs, TechLaw selected the facilities to be audited by utilizing a standard statistical method known as "estimation sampling for attributes." This method uses sampling to estimate, at a prescribed confidence level, the actual compliance rate within a prescribed range of uncertainty. For example, based on the results of auditing a "sample" of treaters, one could say that there is a 90% level of confidence that the compliance rate for treaters is 95% \pm 5%, or between 90 and 100 percent. The sample size required to make such a statement depends on the following four parameters:

- the size of the population being sampled (e.g., the number of treaters),
- the assumed compliance rate,
- the prescribed confidence level, and
- the acceptable range of uncertainty.

In order to arrive at the most reasonable inclusive sample size, an estimated compliance rate must be assumed. TechLaw employed this methodology in the 1986 baseline survey. The *actual* compliance rate observed during the 1987 survey for treaters, W/Ds and retailers was factored into the statistical parameters as the "estimated" compliance rate for the 1988 and 1989 surveys. This estimated compliance rate does not affect the actual compliance rate but does serve as a factor by which a sample size large enough to estimate the actual compliance rate can be calculated.

Because the size of the population and the baseline compliance rates (from the 1987 audit) of treaters and WDRs are now a given, the AWPI/SAWP needed only to agree to a prescribed confidence level and range of uncertainty. The parameters agreed to by AWPI/SAWP from 1986-1989 were a 90% confidence level \pm a 10% range of uncertainty. The statistical sampling formulations based on these parameters yield a sample of 1 treater and 58 WDRs. Because previous audits used a sample size of 14 treaters, the AWPI/SAWP decided to continue using the same sample size for the 1989 CAP audit. Thus, the confidence level for the results pertaining to the treaters has effectively become 95% \pm 5%. TechLaw randomly selected 14 of the 596 treaters identified by the AWPI/SAWP, and 58 of the 27,730 WDRs (15 wholesalers/distributors, 43 retailers). Figure 1, Distribution of On-Site CAP Audits, depicts the geographic distribution of the on-site audits.

TechLaw utilized an audit team designed to provide AWPI/SAWP with the assurance that audits were performed thoroughly and the results documented objectively. The audit team operated under the supervision of the Program Manager who has managed the CAP Audit Program since 1986. For effective management oversight and as a quality assurance function, the Program Manager's responsibilities included reviewing all audit plans, completed audit checklists, and the draft and final reports. TechLaw's audit staff consisted of individuals who have a practical background in technical fields and experience in performing system audits. The system audits and telephone surveys were conducted in a uniform manner so that the audit and survey results could be compared from year to year or from facility to facility.

The audit checklists contained the same questions asked in the 1988 audit program and were designed to elicit objective data regarding implementation of the CAP. Two different checklists were used, one for the on-site audits and one for the telephone surveys (example checklists are included in Appendix A). All information entered onto the checklists was dated, legible, and objective. The checklist information included only facts and observations, free from personal feelings or other comments that might be inappropriate.

Upon completion of each audit, the auditor debriefed the facility manager. The auditor presented his/her findings and recommendations in a professional and tactful manner. The audit debriefings were accomplished in a non-adversarial and constructive environment. The auditors were encouraged to impress the facility representatives that the purpose of the overall audit program was to assist the wood treating industry in implementing the CAP by ensuring that the public is receiving pertinent information concerning the use and handling of treated wood products.

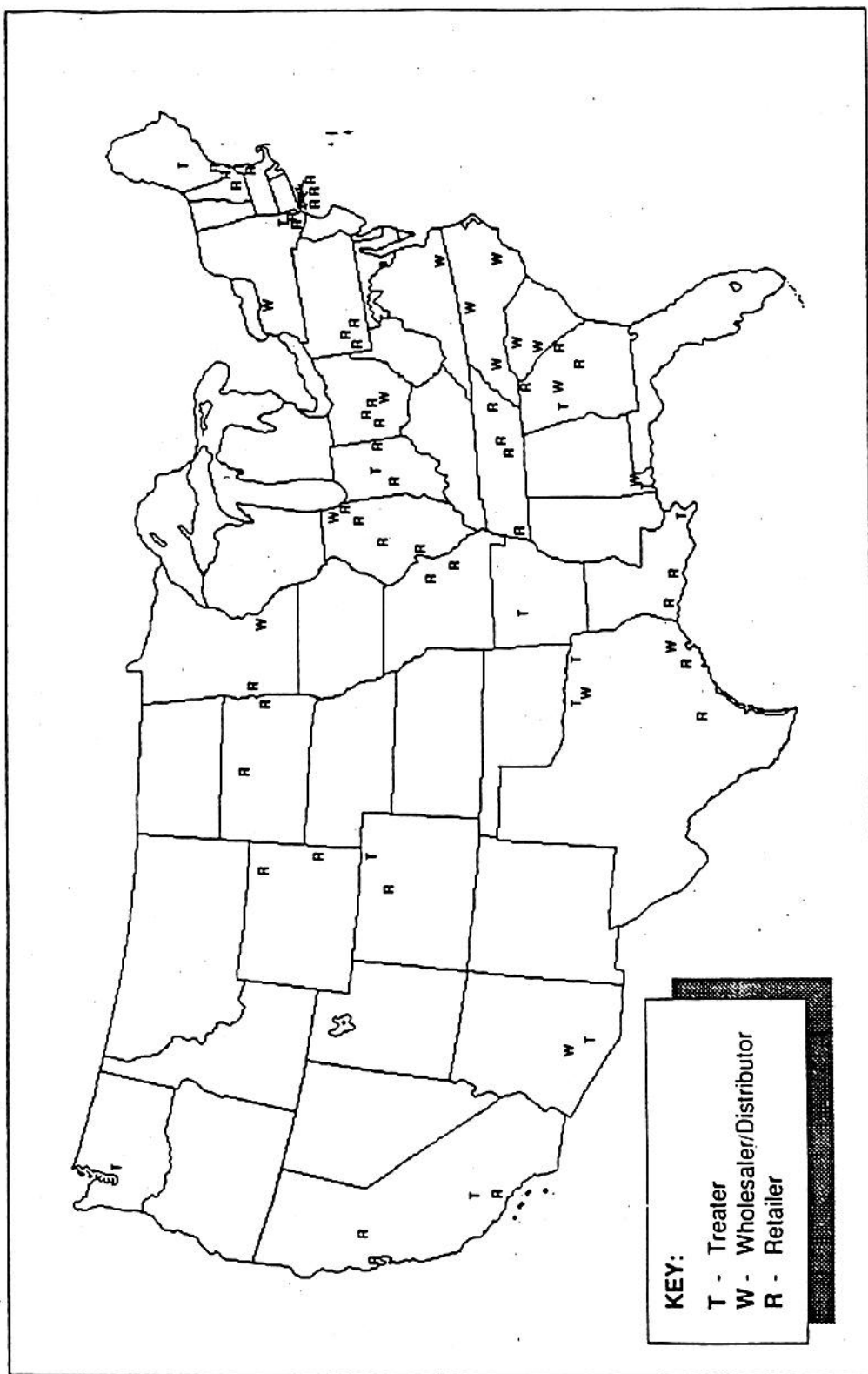


Figure 1. Distribution of On-Site CAP Audits

The TechLaw audit team was aware that findings and issues raised during an audit may not always be interpreted similarly by the facility personnel. The audit team recognized that it is counterproductive to get involved in debates and arguments with facility personnel and refrained from justifying or apologizing for their findings.

Following the completion of the on-site audits, TechLaw reported all instances of non-compliance to the AWPI/SAWP Project Managers. This information provided the AWPI/SAWP an opportunity to promptly contact the facilities not in compliance and allowed the AWPI/SAWP to make arrangements for compliance.

V. RESULTS

TechLaw surveyed via telephone 17 formulators identified by the AWPI/SAWP during July and August 1989. During June through August 1989, TechLaw conducted on-site audits of the 72 randomly selected treaters and WDRs. (The facilities telephoned and visited are listed in Appendix B.) The methodology employed in the design of the compliance audit of treaters, wholesalers/distributors and retailers yielded results that are statistically valid and supportable, and are consistent with generally acceptable auditing standards.

The results of the 1989 CAP Audit Program are similar to those observed during the past 3 audit programs. The results of the telephone surveys and on-site audits indicate that participation in the CAP by formulators and treaters continues at 100%. Likewise, participation by WDRs is 70%, again consistent with rates observed over the last 3 years.

Formulators

Of the 17 formulators surveyed, 17 (100%) were aware of the CAP, and 17 (100%) were actually participating in the CAP. Seventeen formulators (100%) furnished each customer with CISs; 13 formulators (72%) furnished each customer with a CAP sign or placard. Sixteen of the 17 formulators (94%) informed their treater customers of the Settlement Agreement with EPA that resulted in the CAP. Sixteen formulators (94%) encouraged their treater customers to distribute CISs and CAP placards. All of the formulators (100%) were members of trade/industry associations (see Table 1, Results of Formulator Surveys).

RESULTS OF FORMULATOR SURVEYS		
<u>QUESTIONS</u>	<u>RESPONSES</u>	
	<u>Yes</u>	<u>No</u>
1. Aware of CAP?	17	0
2. Participating in CAP?	17	0
3. Furnishing copies of the CIS to treater customers?	17	0
4. Furnishing signs/placards for retail outlets?	13	4
5. Explaining industry agreement to treater customers?	16	1
6. Urging treater customers to distribute the CIS and signs?	17	0
7. Member of an industry/trade association?	17	0

Table 1. Results of Formulator Surveys

Treaters

Of the 14 treaters audited, all (100%) were aware of the CAP and all (100%) were participating in the CAP. All treaters (100%) received written material related to the CAP. All treaters (100%) distributed CISs to their customers. Table 2, Consumer Information Sheet Distribution Methods (Treaters), provides a list of the ways CISs were distributed and the number of treaters who distributed CISs in each specific manner. All treaters (100%) had CISs available at the time of the audit. Thirteen treaters (93%) are members of trade or industry associations (see Table 3, Results of Treater Audits).

CONSUMER INFORMATION SHEET DISTRIBUTION METHODS (TREATERS)	
<u>Method</u>	<u>Number Using This Method*</u>
Attached to Invoice	10
Attached to Product	7
Attached to Bill of Lading/Delivery Ticket	5
Provided by Company Representatives	5
<p>* Many treaters distribute CISs in more than one manner. This accounts for a total larger than 14.</p>	

Table 2. Consumer Information Sheet Distribution Methods (Treaters)

RESULTS OF TREATER AUDITS

<u>QUESTIONS</u>	<u>RESPONSES</u>	
	<u>Yes</u>	<u>No</u>
1. Aware of CAP?	14	0
2. Participating in CAP?	14	0
3. Received CAP material?	14	0
4. Distributing CISs?	14	0
5. CIS available at time of audit?	14	0
6. Member of an industry/trade association?	13	1

Table 2. Results of Treater Audits

Wholesalers/Distributors and Retailers (WDRs)

Of the 58 WDRs audited, 45 (77%) were aware of the CAP and 41 (70%) were participating in the CAP. Forty-five WDRs (77%) received written material relating to the CAP. Forty-one WDRs (70%) distributed CISs to their customers. Table 4, Consumer Information Sheet Distribution Methods (Wholesalers/Distributors and Retailers), provides a list of the ways CISs were distributed and the number of W/Ds and retailers who distributed them in each specific manner. Thirty WDRs (52%) had CISs available at the time of the audit (see Table 5, Results of Wholesaler/Distributor and Retailer Audits).

At EPA's suggestion, the 1989 CAP audit further defined W/Ds as either primarily selling to the building trades or to retail outlets. Of the 15 W/Ds randomly selected, 6 sold primarily to the building trades, 8 sold primarily to retail outlets, and 1 sold equal amounts to both the building trades and retail outlets. Four of the 15 W/Ds (3 selling primarily to retail outlets and 1 selling primarily to the building trades) were not participating in the CAP.

While not necessarily required to assess compliance with the CAP, the audit generated the following additional data which may be useful in supplementing compliance information. Thirty-five WDRs (60%) are members of industry or trade associations. Of the 43 retailers audited, 8 (18%) had a CAP sign prominently displayed. Sales personnel were aware of the CAP in 28 (65%) of the retailers. A CAP participation plaque was not present at any of the retailers audited.

In accordance with the request by the AWPI/SAWP, TechLaw conducted a follow-up survey of non-participating WDRs. Two of the 4 wholesalers/distributors and 5 of the 13 retailers listed as non-participants were re-audited. These follow-up audits showed that all 7 WDRs (100%) had received CAP information and 6 (85%) were now participating. One retailer declined to participate because he felt his business was too small to warrant participation in the CAP.

**CONSUMER INFORMATION SHEET DISTRIBUTION METHODS
(WHOLESALE/DISTRIBUTORS AND RETAILERS)**

<u>METHOD</u>	<u>NUMBER USING THIS METHOD*</u>	
	<u>WDRs</u>	<u>Retailers</u>
Available at Counter/Display	2	18
Handed to Customer at Time of Purchase	3	15
Attached to Invoice	4	2
Attached to Product	2	3
Provided by Sales Representatives	1	1
Attached to Delivery Ticket	1	0
Mailing	0	0
<p>* Some WDRs audited distribute CISs in more than one manner, or did not distribute CISs at all. This accounts for a total not equal to 58.</p>		

Table 4. Consumer Information Sheet Distribution Methods (Wholesaler/Distributors and Retailers)

RESULTS OF WHOLESALER/DISTRIBUTOR AND RETAILER AUDITS				
<u>QUESTIONS*</u>		<u>RESPONSES</u>		
		<u>Yes</u>	<u>No</u>	
1.	Aware of CAP?			
	Wholesalers	12	3	
	Retailers	<u>33</u>	<u>10</u>	
	Total	45	13	
2.	Participating in CAP?			
	Wholesalers	11	4	
	Retailers	<u>30</u>	<u>13</u>	
	Total	41	17	
3.	Received CAP material?			
	Wholesalers	13	2	
	Retailers	<u>32</u>	<u>11</u>	
	Total	45	13	
4.	Distributing CISs?			
	Wholesalers	11	4	
	Retailers	<u>30</u>	<u>13</u>	
	Total	41	17	
5.	CIS available at time of audit?			
	Wholesalers	8	7	
	Retailers	<u>22</u>	<u>21</u>	
	Total	30	28	
6.	Member of an industry/trade association?			
	Wholesalers	11	4	
	Retailers	<u>24</u>	<u>19</u>	
	Total	35	23	
7.	CAP signs on display?	8	35	
8.	CAP sign readable?	8	N/A	
9.	CISs readily available?	14	29	
10.	Sales personnel aware of CAP?	28	15	
11.	Additional information on CIS?	17	26	
12.	Participation plaque present?	0	43	
* Questions 7 - 12 were applicable only to retailers.				

Table 5. Results of Wholesaler/Distributor and Retailer Audits

APPENDIX A

Control No. _____

**TELEPHONE SURVEY FOR
PRESERVATIVE MANUFACTURERS/FORMULATORS**

Date _____

Manufacturer/Formulator Name: _____

Address: _____

Phone: () _____

Contact Name: _____ Position: _____

Type of Product: _____

1. Are you aware of the Consumer Awareness Program (CAP)? Yes No

a. How were you made aware of the CAP?

2. Are you participating in the CAP? Yes No

a. If so, how? _____

3. Are you furnishing each treater customer with one or more copies of the CIS? Yes No

4. Are you furnishing each treater customer with one or more copies of the sign or placard for retail outlets? Yes No

5. Are you notifying each treater customer of the essence of the industry agreement with EPA that has led to the establishment of the CAP? Yes No

a. If so, how? _____

6. Are you urging treater customers to distribute CISs and signs or placards in accordance with the CAP? Yes No

a. If so, how? _____

7. Are you a member of any trade/industry associations? Yes No

a. If so, which association? _____

Comments: _____

Signature _____

_____ Date

Control No. _____

**TREATED WOOD INDUSTRY
CONSUMER AWARENESS PROGRAM AUDIT**

Date _____

Auditor _____

Facility Name: _____

Address: _____

Telephone: _____ / _____

If the company is a Wholesaler-Distributor

Do you sell to:	Building Trades	Yes	No	_____ %
	Retail Outlets	Yes	No	_____ %

Type of Treated Wood Products: _____

☐ CCA ☐ Pentachlorophenol ☐ Creosote ☐ _____

1. Are you aware of the Consumer Awareness Program (CAP)? Yes No

a. How were you made aware of the CAP?

2. Are you participating in the CAP? Yes No

a. If so, how? _____

3. Have you received any material relating to the CAP? Yes No

a. If so, from whom? _____

b. What material did you receive? _____

4. Has the Consumer Information Sheet (CIS) been distributed to customers? Yes No

a. How is the CIS distributed to customers? _____

5. May we have a copy of the CIS? Yes No

a. Does the CIS contain appropriate language for the product(s) sold? Yes No

Comments: _____

6. Is this company a member of any industry or trade association? Yes No

a. If yes, which association? _____

RETAILERS

7. Are signs for the CAP prominently displayed? Yes No

a. Where? _____

8. Are the CAP signs readable? Yes No
a. Do they contain appropriate information on the CAP and/or product? Yes No
9. Are CISs readily available? Yes No
Where? _____

10. Are all sales personnel including cashiers, aware of CAP and CISs? Yes No
11. Has any additional information been added to the CIS? Yes No
a. If so, what? _____

b. Is this additional information appropriately separated from the approved wording? Yes No
12. Is a participation plaque present? Yes No
13. Items for discussion: _____

14. Debriefing Notes: _____

Signature of Auditor

Date

Signature of Company Representative

Date

Company Representative Position/Title

APPENDIX B

FORMULATORS SURVEYED - 1989

Allied Chemical Corporation
P.O. Box 1053R
Morristown, New Jersey 07960
(201) 455-3338

J.H. Baxter & Co.
1700 South El Camino Real
P.O. Box 5902
San Mateo, California 94402
(415) 349-0202

Bernuth, Lembcke Co., Inc.
2050 Coral Way, Suite 300
Miami, Florida 33145
(305) 444-8445

CSI
One Woodlawn Green, Suite 250
Charlotte, North Carolina 28217
(800) 421-8661

Hickson Corporation
Perimeter 400 Center, Suite 680
1100 Johnson Ferry Road
Atlanta, Georgia 30342
(404) 843-2227

Koppers Industries
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219
(412) 227-2505

Mooney Chemicals
2301 Scranton Road
Cleveland, Ohio 44113
(216) 781-8383

ARISTEC Chemicals
600 Grant Street
Pittsburgh, Pennsylvania 15230
(412) 433-2747

Vulcan Chemicals, Inc.
P.O. Box 7689
Birmingham, Alabama 35253
(205) 877-3507

Western Tar Products
2525 Prairieton Road, P.O. Box 270
Terre Haute, Indiana 47808
(812) 232-23842

Reilly Tar & Chemical Corporation
1510 Market Square Center
151 North Delaware Street
Indianapolis, Indiana 46204
(317) 638-7531

Trenton Sales Inc.
2646 South Loop West, Suite 445
Houston, Texas 77035
(713) 666-1130

Hoover Treated Wood
Box 746
Thomson, Georgia 30824
(404) 595-5058

Osmose Wood Preserving Co. of America
980 Ellicott Street
Buffalo, New York 14209
(716) 882-5905

Rentokil, Inc. - Taco Wood Div.
4067 Industrial Park Drive
Norcross, Georgia 30071
(404) 476-4874

Coopers Creek Chemical Corp.
River Road
West Conshohocken, Pennsylvania 19428
(215) 828-0375

Idacon
10611 Harwin Drive, Suite 402
Houston, Texas 77036
(713) 495-4339

TREATERS AUDITED - 1989

Maine Wood Treaters, Inc.
Walker Road
Mechanic Falls, Maine 04256
(207) 345-8411

Circle M Wood Treating Company
P.O. Box 940
Beacon, New York 12508
(914) 838-1400

Thompson Industries, Inc.
Route 1, Box 42
Russellville, Arkansas 72801
(800) 643-5934

Kessel Lumber Supply, Inc.
Star Route 1
Keyser, West Virginia 26726
(304) 788-3371

Atlanta Pressure Treated Lumber Co., Inc.
4250 Stacks Road
College Park, Georgia 30349
(404) 766-1711

Western Wood Preserving Co.
313 Zehnder Street
Sumner, Washington 98390
(206) 863-8191

Great Southern Wood Preserving, Inc.
P.O. Box 987
Theodore, Alabama 36590
(205) 438-6842

Tomco Wood Preserving, Inc.
1121 East 33rd Street, P.O. Box 55131
Indianapolis, Indiana 46205
(317) 926-4535

Arizona Pacific Wood Preserving, Inc.
850 W. Chamber, P.O. Box 968
Eloy, Arizona 85231
(602) 466-7801

Olivier-Celcure Wood Preserving Corp.
4300 Michaud Boulevard, P.O. Box 93
New Orleans, Louisiana 70189
(504) 254-3301

Bowie-Sims-Prange
1440 Hutton Drive
Carrollton, Texas 75006
(214) 446-1150

Fowler Post Company
Route 6, Box 3603A
Clarksville, Texas 75426
(214) 966-2417

Colorado Wood Preserving, Inc.
1313 West County Road 60
Ft. Collins, Colorado 80524
(303) 484-3758

Pacific Wood Preserving of Bakersfield, Corp.
5601 District Boulevard
Bakersfield, California 93309
(805) 833-0429

WHOLESALE/DISTRIBUTORS AUDITED • 1989

Quality Wholesale, Inc.
P.O. Box 482
Franklin, Virginia 23851
(804) 562-6077

Conex Forest Products
1812 Carmel Road, P.O. Box 38395
Greensboro, North Carolina 27408
(919) 282-3496

Brackett Brothers Corp.
Route 1, Box 460
Morganton, North Carolina 28655
(704) 584-0785

Casey's Mill, Inc.
Route 2, Box 233
Dudley, North Carolina 28333
(919) 735-2472

Armstrong & Dobbs Inc.
315 Oconee Street
Athens, Georgia 30601
(404) 543-8271

Neely's Building Supplies
1751 Union Street
Spartanburg, South Carolina 29302
(803) 582-2343

B.L. Mims & Son Lumber Co.
Augusta Road
Edgefield, South Carolina 29824
(803) 637-3306

Bay Lumber Sales
Highway 31
Bay Minette, Alabama 36507
(205) 937-2829

Weyerhaeuser
4575 East 5th Avenue
Columbus, Ohio 43219
(614) 237-3230

Large-Kildea Lumber Co.
112 Hudson Avenue
Rochester, New York 14605
(716) 546-2870

Weyerhaeuser
2431 South Wolcott
Chicago, Illinois 60608
(312) 247-2900

Himes & Star Redwood
4126 West Davis Street
Dallas, Texas 75211
(214) 331-4301

Big Tin Barn Home Center
I-45 S
Conroe, Texas 77301
(409) 273-1111

Stewart Lumber Co.
421 Johnson Street, NE
Minneapolis, Minnesota 55413
(612) 331-5543

Interstate Lumber Co.
4300 North Miller Road, Suite 110
Scottsdale, Arizona 85251
(602) 994-0005

RETAILERS AUDITED - 1989

Steenbeke & Sons, Inc.
Manchester
Concord, New Hampshire 03301
(603) 224-5391

Martin Lumber Co.
383 Hildale Avenue
Haverhill, Massachusetts 01830
(508) 374-6577

The Lumber Yard
P.O. Box 71, Route 236
Eliot, Maine 03903
(207) 439-7800

Metropolitan Lumber
617 11th Avenue
New York, New York 10036
(212) 246-9090

Brooklyn Lumber Corp.
1106 60th Street
Brooklyn, New York 11219
(718) 633-3100

Bell Lumber
244-19 Merrick Boulevard
Jamaica, New York 11422
(718) 525-1534

Heights Lumber Center
3 Windsor Way
New Windsor, New York 12550
(914) 561-1750

New Paltz Lumber Company
10 Main
New Paltz, New York 12561
(914) 255-5700

Action Home Center
Latrobe Shopping Center, Route 30
Latrobe, Pennsylvania 15650
(412) 537-9292

Al Lorenzi Lumber Co.
1600 Jefferson Avenue
Washington, Pennsylvania 15301
(412) 222-1600

William Penn Builders Supply Co., Inc.
3700 Old William Penn Highway
Murrysville, Pennsylvania 15668
(412) 327-5253

Hancock Lumber Co., Inc.
95 York
Kennebunk, Maine 04043
(207) 985-6565

Reeves Building Supply Company
Railroad Street
Clayton, Georgia 30525
(404) 782-4219

Pratt-Dudley Building Supply
1002 University Place
Augusta, Georgia 30901
(404) 724-7755

Norton Lumber/Supply Co.
Wrens, Georgia 30833
(404) 547-6552

Crosslin Supply Co., Inc.
120 Sullivan Street
Eagleville, Tennessee 37060
(615) 274-6237

Scandlyn Lumber
509 South Gateway Avenue
Rockwood, Tennessee 37854
(615) 354-0325

Central Hardware
5475 Elvis Presley Boulevard
Memphis, Tennessee 38116
(901) 332-3150

RETAILERS AUDITED - 1989

Maxwell Central Building Supply
610 W. Burton Street
Murfreesboro, Tennessee 37130
(615) 893-4411

Marysville Lumber & Home Supply Center
111 West 8th Street
Marysville, Ohio 43040
(513) 644-9161

Arlington-Blaine Lumber Company
5479 Linworth Road, P.O. Box 449
Worthington, Ohio 43085
(614) 885-4421

Furrow Building Materials
1250 Upper Valley Pike
Springfield, Ohio 45504
(513) 324-4667

Cloverdale Lumber Company
5 South Main, P.O. Box 227
Cloverdale, Indiana 46120
(317) 795-4600

Commons Lumber Co.
711 Sheridan
Richmond, Indiana 47374
(317) 962-0546

Herren Brothers True Value Hardware/Lumber
Box 9
Guernsey, Wyoming 82214
(307) 836-2225

84 Lumber Co.
East of City
Gillette, Wyoming 82716
(307) 682-8401

Lumberman, Inc.
R.R. 5, Box 5B
Montevideo, Minnesota 55265
(612) 269-6536

Clear Lake Building Center
109 4th Avenue North
Clear Lake, South Dakota 57226
(605) 874-2636

Wager Lumber Sales/Yard
604 West Garfield
Gettysburg, South Dakota 57442
(605) 765-9501

Pioneer Lumber Co.
150 Blackstone Street
Coal City, Illinois 60416
(815) 634-4567

Harvey Lumber Company
1731 West Cermack Rd.
Chicago, Illinois 60608
(312) 847-7100

Dawson Handy Andy Center
2501 North Dirksen Parkway
Springfield, Illinois 62702
(217) 753-6500

Koelling Lumber, Inc.
32 North Clark
Sullivan, Missouri 63080
(314) 468-4169

Potosi Lumber Company
Highway 21, P.O. Box 146
Potosi, Missouri 63664
(314) 438-6161

Central Hardware
1 Crossroads Plaza
Granite City, Illinois 62040
(618) 877-4040

Lowe's of Lake Charles
3601 Highway 14
Lake Charles, Louisiana 70605
(318) 477-7780

RETAILERS AUDITED - 1989

Handy Dan Home Center
4670 Johnston
Lafayette, Louisiana 70503
(318) 981-3400

Call Lumber Company, Inc.
304 West Highway 90-A
Gonzales, Texas 78629
(512) 672-3811

Katy-Mason Home Center
510 South Mason Road
Katy, Texas 77450
(713) 392-8566

Hester's Log & Lumber
8178 U.S. Highway 9
Kremmling, Colorado 80459
(303) 724-3868

Wisda Lumber Company
106 East Santa Maria Street
Santa Paula, California 93060
(805) 525-5536

Golden State Lumber, Inc.
150 South Napa Junction Road
Vallejo, California 94590
(707) 648-0522

Anderson Lumber
5550 Roseville Road
North Highlands, California 95660
(916) 332-7816